

**EXHIBIT 27  
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# Google Public Policy Blog

Updates on technology policy issues

# Committed to competing fairly

Tuesday, February 23, 2010

Posted by Julia Holtz, Senior Competition Counsel

(Cross-posted from the [European Public Policy Blog](#))

As Google has grown, we've not surprisingly faced more questions about our role in the advertising ecosystem and our overall [approach to competition](#). This kind of scrutiny goes with the territory when you are a large company. However, we've always worked hard to ensure that our success is earned the right way – through technological innovation and great products, rather than by locking in our [users](#) or [advertisers](#), or creating artificial barriers to entry.

The European Commission has notified us that it has received complaints from three companies: a UK price comparison site, [Foundem](#), a French legal search engine called [ejustice.fr](#), and Microsoft's [Ciao! from Bing](#). While we will be providing feedback and additional information on these complaints, we are confident that our business operates in the interests of users and partners, as well as in line with European competition law.

Given that these complaints will generate interest in the media, we wanted to provide some background to them. First, search. Foundem - a member of an organisation called [ICOMP](#) which is funded partly by Microsoft - [argues](#) that our algorithms demote their site in our results because they are a [vertical search engine](#) and so a direct competitor to Google. [ejustice.fr](#)'s complaint seems to echo these concerns.

We understand how important rankings can be to websites, especially commercial ones, because a higher ranking typically drives higher volumes of traffic. We are also the first to admit that our search is not perfect, but it's a very hard computer science problem to crack. Imagine having to rank the 272 million possible results

for a popular query like the iPod on a 14 by 12 screen computer screen in just a few milliseconds. It's a challenge we face millions of times each day.

Our algorithms aim to rank first what people are most likely to find useful and we have nothing against vertical search sites -- indeed many vertical search engines like Moneysupermarket.com, Opodo and Expedia typically rank high in Google's results. For more information on this issue check out our guidelines for [webmasters](#) and [advertisers](#), and for an independent analysis of Foundem's ranking issues please read this [report](#) by Econsultancy.

Regarding Ciao!, they were a long-time AdSense partner of Google's, with whom we always had a good relationship. However, after Microsoft [acquired](#) Ciao! in 2008 (renaming it [Ciao! from Bing](#)) we started receiving complaints about our standard terms and conditions. They initially [took their case](#) to the German competition authority, but it now has been transferred to Brussels.

Though each case raises slightly different issues, the question they ultimately pose is whether Google is doing anything to choke off competition or hurt our users and partners. This is not the case. We always try to listen carefully if someone has a real concern and we work hard to put our users' interests first and to compete fair and square in the market. We believe our business practices reflect those commitments.



Labels: [Competition](#) , [Public Policy Blog](#)

**22 comments :**

**Unknown** February 23, 2010 at 8:19 PM

I hate Microsoft

[Reply](#)

**Unknown** February 23, 2010 at 11:34 PM

Let's go Google OS

[Reply](#)

**jacobian** February 24, 2010 at 1:16 AM

well I support google then. :-)

[Reply](#)

**Unknown** February 24, 2010 at 2:26 AM

Short view comments.

Reminder : intel has been convicted after a case initiated by amd.

Google is not snow-white and Microsoft is not the devil

[Reply](#)

**Alexis** February 24, 2010 at 2:38 AM

Micro-WHO? eat them for breakfast please...

ps: always remember... it's Balmer... (hoooow much does this cost?)

[Reply](#)

**DrKPI** February 24, 2010 at 3:29 AM

I believe the trouble is really that Google's market dominance is major:

<http://commetrics.com/articles/simplicity-wins-again/>

Of course all to drive its search engine business and stay dominant (see chart in above post).

Unfortunately, having more than 70% of the search traffic will result in the competition feeling its is treated unfairly.

If Google did nothing wrong, the probe will reveal little if anything. But as Alexis comments above, it will cost the company a few dollars to defend itself.

Thanks for sharing this information. We posted a few things about it here:

<http://cli.gs/pvQpT2>

Urs

My.ComMetrics.com - benchmark your blog => improve performance

[Reply](#)

**Unknown** February 24, 2010 at 4:57 AM

This comment has been removed by the author.

[Reply](#)

**Yalakom** February 24, 2010 at 5:02 AM

Monopolies are usually not good but hey, Google just can't help to be the best, what else can we do but use its amazing search engine, honestly ? :-)

Google helps you get ahold of documents you will not find easily (or at all...) on specific websites where the information is supposed to be because these websites's search engines suck so much - especially public agencies websistes where the information should be easily available for anyone who's doing a basic search.

So, it's them who have a problem, not Google, at least from where I stand = face to face with my computer...

[Reply](#)

**gonden** February 24, 2010 at 5:58 AM

If Google where a political party in Sweden I would be a member, vote for them and helped out for free in the campaign. Oh my God how I hate Microsoft.

[Reply](#)

**Unknown** February 24, 2010 at 7:24AM

Love Google.

However, if you really want to prove your claim, you must openly abide by the "AttentionTrust". Please Google those two words, and research it.

If we as a nation make law the AttentionTrust (Creative Commons equivalent governing personal data privacy) -

Google could peacefully evolve into the incredible structure it deserves to be.

[Reply](#)

**Khürt Williams** February 24, 2010 at 8:07 AM

This is all sour grapes from also ran "competitors". I use Google services because they are more open and better for my needs than other services.

My concern is that this is really an attempt to get discovery on Google's algorithms and code which the competition will then use.

I never understood Europe's idea of capitalism. If a product or service or company is more

successful than the competition Europeans for some reason think this is just unfair. Must every company strive to be mediocre?

[Reply](#)

**Scott Cleland** February 25, 2010 at 10:51 AM

For those who wish to learn the other side of this issue please see my post about the EU-Google antitrust investigation, which has copious links to research showing that Google is indeed a monopoly and how it is anticompetitively abusing its monopoly position in many ways.

<http://googlemonitor.com/2010/foundem-fcc-filing-documents-google-search-network-discrimination-window-into-eu-google-antitrust-case/>

Scott Cleland

President Precursor LLC

Publisher of GoogleMonitor.com, a watchdog site dedicated to making Google more transparent and accountable

[Reply](#)

**Otto** February 25, 2010 at 11:41 AM

Google is a monopoly using its power to remove its competitors. :[

[Reply](#)

**Unknown** February 26, 2010 at 6:48 AM

I do not believe that Googles process of filtering or de indexing companies is a completely automated one which the Holy Algorithm controls. This has a manual element that Google can essentially decide who gets to be in or out or to what level. This in itself is anti-competitive for the big organisations trying to use the web (Google) to promote themselves and for smaller companies like my own can completely put them out of business. This I believe deserves investigating and I for one would like to get some understanding as to how Google decides and only something as large as the EU anti trust can open this up. PS: The ALogrithm can stay closed, it is the manual processes and management decisions that need to be exposed.

[Reply](#)

**David** February 27, 2010 at 12:49 PM

This is Microsoft getting what they deserve for 20 years of stifling innovation. Screw them.

[Reply](#)

**Unknown** February 27, 2010 at 4:00 PM

My feeling is that the fundamental issue isn't so much that Google has a monopoly in search that it uses to its advantage to deposition and lock out competitors (though it probably has

one), but Google's corporate culture. To me, Google has the same type of arrogance that MSFT and Enron had, which ultimately gets the company into trouble. It's traceable to the types of people that they hire(all high-performing Ivy-League types), which leads to a sort of group-think that makes them truly think that they are the smartest guys in the room who can do no wrong; essentially they are tone deaf and blind to the consequences of their actions. I wish the NEXT Google would hurry up and come along and put some humility into Google - ultimately it won't be MSFT that does this, but some other disruptive innovator.

[Reply](#)

**Unknown** February 28, 2010 at 8:44 PM

Come on Google - You copied the iPhone with Android, (thanks to the fact that you sat on Apple's Board of Directors and had advance notice of what Apple was building), and are using the money from your advertising business and giving Android away to everyone. This is what Microsoft did with IE many years ago. The behavior of a monopolist.

[Reply](#)

**del hickman** March 4, 2010 at 7:01 PM

I see so much love for google. Obviously these people have never been on the other side of the fence. Try opening up an adsense account and advertising with them for a while. Love to see your post after a month.

[Reply](#)

**Political Science** April 12, 2010 at 7:11 AM

**Politics**:- This campaign must properly test the parties' competing cases on how exactly they will help small businesses get on with this job for **student aid**. The current debate around employer's National Insurance Contributions is the right one to be having. Beyond that, though, how can we control the extra costs which new regulations bring in several times a year? And we need to see where the parties stand on the details of business finance. Are they all committed, for example **medical school**, to the introduction of a credit adjudicator, as outlined in last month's Budget, with real, statutory powers to force the big banks to behave fairly thanks for lovely posing.

[Reply](#)

**tthe ViSigoTH** September 7, 2010 at 1:21 PM

Dear Microsoft,  
Get a life.

[Reply](#)

**smplicv** November 11, 2010 at 6:13 AM

This comment has been removed by the author.

Pedro Cruz January 5, 2011 at 7:18 AM

go google go !

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